

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE:	:	MDL No. 2543
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GENERAL MOTORS LLC IGNITION SWITCH LITIGATION	:	Master File No.
	:	14-MD-2543 (JMF)
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**BAILEY COWAN HECKAMAN PLLC AND POTTS LAW FIRM’S MOTION FOR
ORDER PERMITTING UNDER SEAL AND *IN CAMERA* SUBMISSION OF EXHIBITS
TO THE FIRMS’ CONSOLIDATED REPLY IN SUPPORT OF THEIR MOTION FOR
DECLARATORY JUDGMENT ON ASSESSMENTS (ECF. NO. 7369)**

In connection with this Court’s November 15, 2019 Order (ECF 7406) requiring Bailey Cowan Heckaman PLLC (“BCH”) and Potts Law Firm (“Potts”) (collectively the “Firms”) to jointly file their reply in support of their Motions for Declaratory Judgment, the Firms respectfully request an Order permitting the Firms to file portions of, and certain exhibits to, the Firms’ Consolidated Reply in Support of Their Motion for Declaratory Judgment on Assessments (“Consolidated Reply”) for certain of the Firms’ state-court filed and unfiled cases, under seal and *in camera*. Specifically, the Firms request permission to: (1) file fully under seal and *in camera* Exhibits A-C & E to the Firms’ Consolidated Reply in Support of their Motion for Declaratory Judgment on Assessments (hereinafter the “Firms’ Reply”); and (2) file in partially redacted form the Firms’ Reply to protect the attorney work product and otherwise confidential information about settlements cited therein. Because the above-referenced exhibits and certain redactions in the Consolidated Reply reflect attorney work product, the Firms respectfully request that the Court permit the Firms to submit said filings under seal and *in camera* (that is, filing under seal and

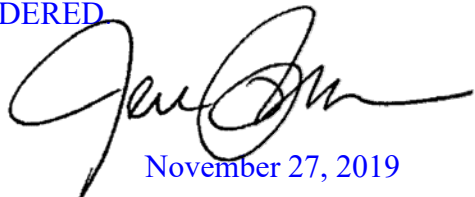
submission to the Court by email without disclosure to New GM). The Firms are contemporaneously filing a Memorandum in Support of this Motion.

Dated: November 26, 2019

BAILEY COWAN HECKAMAN PLLC

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Application GRANTED temporarily. The Court will assess the propriety of the sealing and redactions when deciding the underlying motions. The Clerk of Court is directed to terminate 14-MD-2543, ECF No. 7505. SO ORDERED



November 27, 2019

THE POTTS LAW FIRM, LLP

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document as served upon the attorney of record for each other party through the Court's electronic filing service on November 26, 2019, which will send notification of such filing to the e-mail addresses registered.

/s/ Robert W. Cowan
Robert W. Cowan